

March 17, 2003

Rebecca Kane

U.S. Environmental Protection Agency

Office of Enforcement and Compliance Assurance

Mail Code 2222A

1200 Pennsylvania Avenue NW

Washington, DC, 20460

Dear Ms. Kane:

The National Ready Mixed Concrete Association would like to express some concerns about the dissemination of information on your new Environmental Compliance History Online web page. As an organization that is working with industry to raise the bar environmentally and go beyond compliance, we want to be sure that information presented to the public is timely and correct. We would also like to be certain that the information is presented in an easily comprehensible format so that those accessing your data will understand the nature and gravity of a violation. For example, if a facility is noted for a paperwork infraction, the user of the ECHO data should be able to discern that there were no releases to the environment and that their health and safety were never in jeopardy. Unclear information could harm good neighbor endeavors initiated by a business to survive in a community.

Additionally, the quality of the data presented is extremely important to our industry. We are concerned that if a facility is fortuitously noted with an infraction, it may be difficult for the business to recover from this oversight. The facility may have to expend a great deal of remedial public relations to be back in the good graces of the community. The capability should be in place to quickly correct errors and to inform the individual accessing the information that a correction has been made. We also wish to see that corrective measures taken are noted to show that there is no continuing harm to any individual in the community or to the environment.

The ECHO web page is one of many great steps taken by your agency to help preserve the environment in the United States. We appreciate the opportunity to comment on the ECHO program and to help you to make this product better. If you have any questions or comments, please feel free to call me on my direct line at 240.485.1154.

Sincerely,

[IMAGE]

Edward R. Herbert III

Director of Environmental Affairs